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March 14, 2023

By ECF

Hon. Gregory H. Woods
United States District Judge
Southern District of New York
500 Pearl Street, Room 2260
New York, NY 10007

Re: *Donohue v. Richard Carranza, et al.*
No. 20 Civ. 05396 (GHW) (SDA)

Dear Judge Woods:


We represent defendants Niagara Falls City School District s/h/a Niagara Falls Public School District and Mark Laurie, in his official capacity as Superintendent (collectively, “Niagara”), in the above-referenced action.

We write to join the NYC DOE’s request for a thirty-day extension of time to move for attorneys’ fees under 31 U.S.C. § 3730(d)(4) (Dkt. #260). Like the NYC DOE, this extension will afford Niagara additional time to properly evaluate the relevant legal standards and their applicability to the case. It will also promote judicial efficiency by avoiding piecemeal litigation of the attorneys’ fees issue.

This is the first request for an extension of time to file this motion. Niagara reached out to Plaintiff-Relator, but received no response concerning this request.

We appreciate the Court’s courtesies.

Respectfully submitted,



Jonathan P. Shaub

cc: Counsel of Record